

Honorable Robert S. Lasnik  
Trial Date: June 4, 2022

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALEXANDRA TABER,

PLAINTIFF,

vs.

CASCADE DESIGNS, INC. *et al.*

DEFENDANTS.

NO. C20-1633RSL

**STIPULATION TO FILE  
SECOND AMENDED  
COMPLAINT WITH  
DEFENDANT CIGNA  
REMOVED AND DEFENDANT  
CONTACT INFORMATION  
REDACTED**

**NOTED: November 11, 2021**

**STIPULATION**

Plaintiffs Alexandra Taber, Alexandra Taber as Guardian of LT (“**Plaintiffs**”) and Defendants Cascade Designs, Incorporated, David Burroughs, John Burroughs, John Gevaert, James Cotter, Eric Hobbs, Steve McClure, and Harry Ross (“**Defendants**”) (collectively, the “**Parties**”) through their undersigned counsel stipulate and agree to the following:

(1) The Court previously entered an order to seal the *Complaint*, Docket No. 1, and the *First Amended Complaint*, Docket No. 41. (Dkt. # 51.) In the same order, Docket No. 51, the

**STIPULATION TO FILE SECOND  
AMENDED COMPLAINT - 1**  
NO. C20-1633RSL

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1 Court ordered the parties to refile the *Complaint* and *First Amended Complaint* with specific  
2 information redacted.

3 (2) The Court previously dismissed Defendant Cigna Health and Life Insurance  
4 Company. (Dkt. # 58.)

5 (3) The Court previously granted Plaintiffs' motion to amend and file a second  
6 amended complaint "in substantially the form of Dkt. # 65-1." (Dkt. # 73.) Docket No. 65-1 is  
7 the *[Proposed] Second Amended Complaint*.

8 (4) The *[Proposed] Second Amended Complaint* contained unredacted information  
9 that was subject to the Court's order to seal. (Dkt. # 51.)

10 (5) The *[Proposed] Second Amended Complaint* also contained allegations and  
11 claims against dismissed Defendant Cigna Health and Life Insurance Company and included  
12 Cigna Health and Life Insurance Company as a defendant. (Dkt. # 65-1.)

13 (6) The *[Proposed] Second Amended Complaint* was filed both as an attachment to  
14 Plaintiffs' motion to amend as, pages 6 through 73 in that motion, and as a separate exhibit,  
15 Docket No. 65-1.

16 (7) The Parties hereby stipulate to seal both copies of the *[Proposed] Second*  
17 *Amended Complaint* in the court file and specifically stipulate to seal (a) Docket No. 65 and (b)  
18 Docket No. 65-1.

19 (8) The Parties hereby stipulate that Plaintiffs will file redacted versions of these  
20 sealed documents and specifically stipulate to file the document attached hereto as Exhibit 1 as  
21 the redacted version of Docket No. 65 and the document attached hereto as Exhibit 2 as the  
22 redacted version of Docket No. 65-1.

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24  
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DATED this November 11, 2021.

Davis Wright Tremaine LLP  
Attorneys for Defendants  
(via email authorization)

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**ORDER**

Having reviewed the stipulation above, the Court hereby ORDERS as follows:

- (1) The clerk shall seal Docket No. 65 and Docket No. 65-1; and
- (2) Plaintiffs shall file redacted versions of Docket No. 65 and Docket No. 65-1 as they appear in Exhibits 1 and 2 to this stipulated motion.

DATED this 12th day of November, 2021.

  
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HONORABLE Robert S. Lasnik

UNITED STATES DISTRICT JUDGE